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VIA ECF AND FIRST CLASS U.S. MAIL

*To All Defendants and Putative Defendants*

February 19, 2014

Re: *Lehman Brothers Special Financing Inc. v. Bank of America National Association et al., Adv. Proc. No. 10-03547 (SCC)*

Dear Counselors:

As you know, we represent Lehman Brothers Special Financing, Inc. (“LBSF”) in the above-referenced adversary proceeding. Pursuant to the Order Extending Stay of Avoidance Actions and Granting Certain Related Relief Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 7004(a)(1) entered by this Court on January 31, 2014 [Docket No. 42417] (the “Order”), LBSF files herewith a Notice of Proposed Scheduling Order [Adv. Pro. No. 10-03547 (ECF No. 707)] (the “Proposed Scheduling Order”).

Please provide the undersigned counsel with any comments to the Proposed Scheduling Order no later than February 26, 2014 at 5 p.m. EST. Any comments should be sent to [abialek@wmd-law.com](mailto:abialek@wmd-law.com). After receiving comments, if any, we will be in touch to coordinate a time in which to meet and confer, either in person or by telephone. As contemplated by the Order, LBSF shall file changes to the Proposed Scheduling Order, if any, by March 24, 2014.

Very truly yours,



Adam M. Bialek

Encls.